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September 29, 2020

The Honorable Colm F. Connolly
U.S. District Court for the District of Delaware
844 North King Street
Wilmington, DE 19801

Re: *In re: Palbociclib Patent Litigation*, MDL No. 19-2912 (CFC);
Pfizer Inc., et al. v. Aizant Drug Research Sols. Pvt. Ltd., et al.,
C.A. No. 19-743 (CFC) (consolidated)

Dear Judge Connolly:

Plaintiffs write regarding the pending discovery dispute between Plaintiffs and defendants Zydus Pharmaceuticals (USA) Inc., Zydus Worldwide DMCC, and Cadila Healthcare Limited (collectively, “Zydus”). Plaintiffs filed a motion to compel Zydus to supplement its responses to Interrogatory Nos. 1-4, which seek Zydus’s bases for its non-infringement assertions, and No. 9, which relates to its market research for products embodying the invention. Yesterday, Zydus served Supplemental Response to Interrogatories Nos. 1-4 along with its answering brief. D.I. 207, 208 in MDL No. 19-2912-CFC. Because Zydus’s supplemental response provides the relief that Plaintiffs sought, Plaintiffs believe that the dispute regarding Interrogatory Nos. 1-4 is now moot.

Accordingly, Plaintiffs wanted to inform the Court that it need not consider the first section of Plaintiffs’ letter brief (D.I. 206 at 1-3 (“1. Interrogatory Nos. 1-4”)). The only dispute that remains is with respect to Interrogatory No. 9 (*id.* at 3 (“2. Interrogatory No. 9”)). Plaintiffs also attach an updated version of their Proposed Order limited to Interrogatory No. 9.

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Respectfully,

/s/ Megan E. Dellinger

Megan E. Dellinger (#5739)

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Attachments

cc: Counsel of Record (via electronic mail; w/attachments)